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JAN 27 1992

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Federal Communications Commission
Office of the Secretary

In the Matter of)

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)
Amendment of Part 97 of the)
Commission's Rules Governing the)
Amateur Radio Service Regarding)
Repeater and Auxiliary Operation)
In the 1.25 Meter Band)

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RM-7869

FCC MAIL BRANCH

REPLY COMMENTS OF A GROUP OF SOUTHERN CALIFORNIA
222 MHZ WEAK SIGNAL OPERATORS

On Dec. 24, 1991, the undersigned filed comments in support
of the Petition for Rule Making of the American Radio Relay
League, Inc. (the League) in the above-captioned proceeding.

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SMA has indicated that this repeater is not coordinated. But in fact, it is there. The appearance of an uncoordinated repeater in the tiny weak signal subband recognized by SMA shows why voluntary band planning will not work: even if SMA should set aside a reasonable band segment for weak signal operation (which seems unlikely), there is no guarantee that it would not be taken over by uncoordinated repeaters. In fact, although the 1991-92 ARRL Repeater Directory lists more than 900 coordinated repeaters in Southern California, uncoordinated repeaters are springing up wherever they are not specifically prohibited by the Commission's rules. Only a mandatory non-repeater subband will preserve even a small segment of 1.25 meters for other uses.

2) Virtually all of the comments opposing the League's Petition came from Southern California repeater operators, and these comments reveal another reason why voluntary sharing of the 1.25 meter band cannot succeed: many repeater owners seem to think they own the frequencies their repeaters use! For example, Alan Sanders said:

Say a small number of homeless people are living in a park adjacent to your home. Your local city council decides that they should vacate the park, and have a home, so you are asked to vacate your home, to provide the homeless few a place to stay. You certainly would not vacate your home for this reason. Therefore, it is preposterous to ask these seventeen repeaters to go off the air, so someone can occasionally bounce signals off the moon.^{1/}

^{1/} "Petition Against Rule Making" (sic) of Alan Sanders, pg.3.

Granted, weak signal operators may presently be "homeless" on the 1.25 meter band due to the Commission's action in Docket 87-14 (which reallocated the 220-222 MHz band, including the 220-220.5 MHz weak signal subband, without creating a new weak signal subband above 222 MHz). But repeater owners are most certainly not analogous to private homeowners who are being asked to give their homes to the homeless: they may own their equipment, but not the frequencies they use. A more accurate analogy would be to compare repeater owners to a group of campers who have taken over an entire public park and are refusing to let anyone else use the park. What is needed is a park ranger--in this case the Commission--to tell them they must share the public park with others.

3) Many of the commenters who oppose the League's position claimed--seemingly in boiler plate language--that a "survey" showed little interest in non-repeater modes in Southern California. For example, commenter Sandra Mae Heyn said:

A survey of all members of the 1.25 Meter community in Southern California were ask (sic) where their operating interests were and less than 1% indicate weak signal. SSB. and other experimental operations.^{2/}

Apparently only members of SMA (which is, after all, an FM repeater coordinating body) were invited to participate in this survey. If a similar survey were taken at the annual West Coast VHF Conference--which attracts persons interested in weak signal and other experimental modes rather than FM repeaters--the result would be just the opposite. This alleged survey did NOT poll "all members of the 1.25 meter community;" its conclusions are highly suspect.

4) Several commenters accused the League of bowing to pressure from "special interest groups" in deciding to file the Petition for Rule Making in this proceeding, but without substantiating that claim in any way. However, the minutes of the July, 1991, meeting of the League's Board of Directors indicate that the Board voted by an overwhelming 13-1 margin, with one abstention, to file this Petition.^{3/} That kind of near unanimity can hardly be dismissed as the result of undefined pressure from

aside five per cent of a 3 MHz-wide amateur band will adversely affect emergency communications. But another pro-repeater commenter, Richard A. Rudman, acknowledged that "the 2 meter band in our region (Southern California) carries the bulk of the emergency traffic load." Rudman said that 1.25 meters "serves as an important safety net should interference occur, or 2 meter facilities fail."

In fact, Commission action to set aside five per cent of the 1.25 meter band for non-repeater use could hardly have a significant impact on emergency communications because of the enormous number of repeaters operating in the other 95 per cent of the band--and on other VHF-UHF bands. According to the 1991-92 ARRL Repeater Directory, there are now 173 coordinated repeaters on the 1.25 meter band in Southern California, including 71 in Los Angeles County alone. According to the Repeater Directory, the proposed rule would affect 13 (not the 17 claimed by some commenters). That would leave 64 repeaters on the 1.25 meter band in Los Angeles County alone, and 160 in Southern California--even if none of the 13 that would be displaced could be reaccommodated above 222.150 MHz. And as we indicated in our original comments, many of those repeaters are used only a small percentage of the time. With minimal channel sharing, all of the existing repeaters can be reaccommodated. In any case, the remaining 160 repeaters will provide a large amount of backup communications capability during emergencies. And with more than 900 repeaters

on all bands in Southern California, the effect of moving 13 of them to shared frequencies will be insignificant.

The Commission should note that setting aside five per cent of the band for non-repeater use will still leave Southern California with more 1.25 meter repeaters than any other region of the country--and with twice as many as the New York metropolitan area. But on the other hand, tying up the entire 1.25 meter band with FM repeater activity--and leaving no room for experimental modes--would assure that the amateur community is permanently locked into the present pattern of using 40 KHz of spectrum for each two-way contact (a 20 KHz input channel and a 20 KHz output channel). There would be no place for the development of narrow bandwidth modes that could allow amateurs to make more efficient use of the spectrum.

Moreover, there are alternate ways SMA could accommodate the 13 displaced repeaters above 222.150 MHz. For example, Southern California's 144 MHz repeaters use 15 KHz rather than 20 KHz channel spacing. Changing to 15 KHz spacing could potentially create 23 additional repeater channel pairs in the 1.25 meter band.

6) Some commenters cited their substantial investment in repeater equipment as an argument against restoring the weak signal operators' access to the 1.25 meter band. This ignores the fact that weak signal operators, like repeater owners, have a

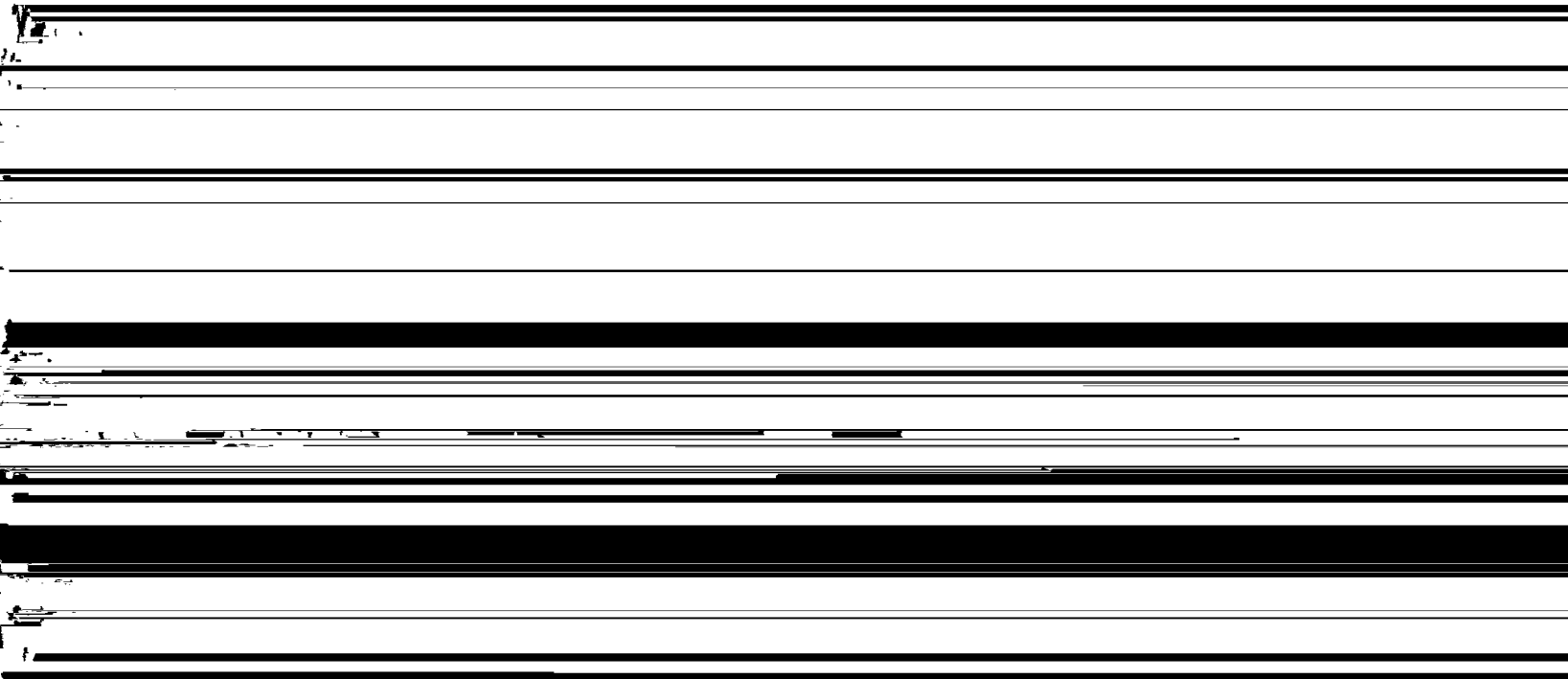

substantial investment in equipment. Many of us have sophisticated and costly CW/SSB transceivers, along with high powered amplifiers and multi-bay antenna arrays for 1.25 meters.

Some of these commenters also suggested that they cannot move their repeaters to other frequencies within the band because the repeaters are crystal controlled. That is absurd: a new set of crystals can be purchased at a nominal cost, and all of the modern, commercially available 222 MHz repeaters and duplexers are designed so that they may be adjusted to operate on any frequency in the band by changing crystals and retuning the units.

7) Several commenters said that there is growing demand for repeater spectrum in Southern California. That may be true, and it undoubtedly explains why so many uncoordinated repeaters are showing up: many amateur radio licensees want their very own repeaters, even though most of Southern California's 173 coordinated repeaters on 1.25 meters are used only a small percentage of the time. But even the owners of little-used repeaters want exclusive use of their input and output frequencies. The Commission must seriously consider whether it is in the public interest

to supplant other users. Several commenters called weak signal operators a "special interest," but if we represent a special interest, so do repeater owners. It is not realistic to expect one special interest to relinquish its own claims to the spectrum in a voluntary act of magnanimity toward competing interests.

For at least 50 years, the Commission has had rules setting aside a portion of virtually all amateur bands for activities that require protection from other wider-bandwidth, stronger-signal activities. Every band between 2 MHz and 222 MHz has some spectrum set aside for Morse telegraphy and other narrow bandwidth communications. If the rules mandating those subbands were rescinded and the division of each band between voice and telegraphy operations were made voluntary, voice stations would im-



the 1.25 meter band available for non-repeater operations in many metropolitan areas. And the arrival of an uncoordinated repeater in the tiny weak signal subband now recognized in Southern California underscores the fact that voluntary band-planning efforts, no matter how well intentioned, cannot assure the availability of any band segment for non-repeater use. If weak signal and other narrow bandwidth operations are to have any access to the 1.25 meter band, the Commission must act to establish a non-repeater subband. We again urge the Commission to respond favorably to the League's Petition for Rulemaking in this matter.

Respectfully submitted,

A Group of Southern California
222 MHz Weak Signal Operators

By James A. Steffen
James Steffen, KC6A
January 23, 1992

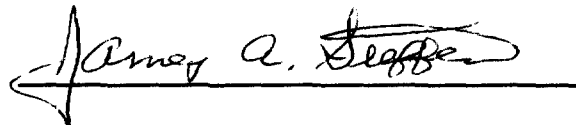
The following Southern California amateur radio licensees have agreed to join in these Reply Comments: Wilson E. Anderson, AA6DD; Joe Burke, K6IBY; Ken Halford, WB6DTA; John Kitchens, NS6X; Steve Noll, WA6EJO; James Sczepczenski, WD6AUP; Gayle Sharlow, WA2ODN; James Sharlow, WB2ODN; Alan Soenke, WA6VNN; Warren Taylor, WB6PCS; and Keith Thompson, K6PVS.

Mailing address: James Steffen, KC6A, 6831 Espanita, Long Beach, CA 90815

CERTIFICATE OF SERVICE

I, James Steffen, certify that on this 26th day of January, 1992, I caused copies of the foregoing "Reply Comments of Southern California 220 MHz Weak-Signal Operators" to be mailed first class, postage prepaid, to the following:

Christopher D. Inlay, Esq.
The American Radio Relay League, Inc.
1920 N Street, N.W.
Suite 150
Washington, D.C. 20036

A handwritten signature in cursive script, reading "James A. Steffen", is written over a horizontal line. The signature is written in dark ink and includes a stylized flourish at the end.